

JOHN WAIHEE
GOVERNOR OF HAWAII



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~~DEPARTMENT OF HEALTH~~
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH

P. O. BOX 3378
HONOLULU, HAWAII 96801

In reply, please refer to:
EMD / SDWB

August 25, 1994

Ms. Doris Betuel, Chief
Source Water Protection Section
U.S. EPA, Region IX (W-6-3)
San Francisco, CA 94105-3901

ATTENTION: Ms. Shannon FitzGerald

Dear Ms. Betuel: *Doris:*

Subject: HAWAII UIC PROGRAM'S REVIEW OF
DRAFT FEDERAL UIC PERMIT #HI594000001 FOR
LAHAINA WASTEWATER RECLAMATION FACILITY

Thank you for allowing us to review the draft permit. We have listed our comments in two categories: General Comments and Section Comments. The General Comments do not apply to any specific section of the permit; the Section Comments do. Only the section numbers are listed for reference in the Section Comments, not their titles.

** 1.) 5.5 mgd*

General Comments

1. The permit needs a section for definitions and perhaps acronyms.
2. A copy of Hawaii's current standard permit form is enclosed for your use. This permit form, along with attached tables that list analytical options, is used for industrial and municipal wastewater injection well facilities.

← They don't have this in their general permit.

Section Comments

Part I. Elaborate on the term "waste injection" to describe municipal sewage.

municipal water

Part II. A. 1. For permits that we currently write, we show this information in table form which makes for faster comprehension of the details of the well. The State's Lahaina WWTF permit will have this format when an opportunity for revision of the permit arises. Please refer to the enclosed standard permit for the tables.

Part II. A. 3. (a) We refer to a sampling point approved by the Director. This gives us flexibility to be reasonable and considerate of existing conditions or circumstances of the facility without compromising the sample's integrity.

good →
Part II. A. 3. (c) Language could be added to emphasize your authority to call for more monitoring wells and to call for modifications to the monitoring program based on changing needs and concerns. Also, include language to state through what process will government scrutinize and inspect the construction of the monitoring wells. A start-up time period for well construction should be established.

Part II. A. 4. Do proposed changes of Appendix B affect the technical description of the wells as described in this permit? If so, then a revision to the existing description of the wells may be necessary later.

Part II. B. If Appendix C does not specifically state the number of new injection wells with all relevant details, then such information should be included in Appendix C. Injectivity testing requirements for each new well should be addressed either before or during construction of the well as a procedural requirement.

This section addressing the approval to construct additional wells seems adjunctive to the function of the permit. Perhaps this section reflects a standard style of how EPA produces permits. Normally for Hawaii, well construction approvals are not addressed within the written permit; construction approvals are addressed in the procedures for attaining a permit. Hawaii's permit only reflects what has been constructed, tested and approved for operation.

Part II. D. 3. (c) (i) The term "Area of Review boundary" should be defined. The definition may affect the logic of this condition. 2

Part II. D. 4. (c) (iii) Assuming that a nitrate concentration limitation can be imposed on the facility's effluent, the limitation should only apply to the effluent without fluctuations on the effluent's limitation that are dependent on nitrate concentrations in the groundwater. If groundwater nitrate concentrations are of concern, a groundwater nitrate concentration level should be established which would then be used to establish a nitrate concentration limit

for the permit. The important aspect is to set a definitive limitation in the permit and not let the limitation fluctuate due to fluctuating conditions in the groundwater. The permit limitation can always be revised when necessary to account for a new groundwater nitrate concentration, as conditions in nature do change. This proposed strategy of monitoring, although not idealistically perfect, is practicable and will promote compliance to monitoring responsibilities.

pg 8.4.6.

- Part II. D. 4. (d) Include language that states that fluids not authorized by the permit shall not be injected (in addition to that which is stated in Part III. A.); only fluids that have been approved by the Director can be injected.
- Part II. E. 3. Enclosed is Hawaii's UIC permit monitoring list for Lahaina WWTF. If Hawaii's list satisfies your concerns for monitoring, direct reference to Hawaii's list would ease Maui County's efforts in understanding the parameters for which to test. If you have parameters in addition to Hawaii's list, then only those parameters would need to be listed in the federal permit. In doing this, EPA's and Hawaii's parameters for testing would be very clear and distinctive.
- Part II. E. 4. The continuous monitoring of sewage effluent temperature seems excessive.
- Part II. E. 6. The automatic warning system should be referenced to specific parameters, e.g., injection pressure, head level in well, water level at weir, turbidity, temperature, etc.
- Part II. F. 2. Reference should be made for the permittee to also comply with the abandonment conditions of any other county, state or local agency (in addition to the statements of Part III. A. and Appendix E).
- Part III. E. 10. (c) List a telephone number(s) for reporting on weekdays, weekends and after work hours.
- Part III. E. 11. (b) Define U.S.C.
- Appendix F The use of this appendix in the permit seems anachronic. Information related to this appendix belongs in the application.

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If you have any questions about this subject, please call Norris Uehara or
Chauncey Hew of the Safe Drinking Water Branch at 808-586-4258.

Sincerely,



WILLIAM WONG, P.E. Chief
Safe Drinking Water Branch
Environmental Management Division

CH:kt

Enclosures: 1. Hawaii's Standard Permit
2. Lahaina WWTF UIC Permit Monitoring List

c: Wendy Wiltse, Ph.D.
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